

**UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT**

UNITED STATES OF AMERICA)
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AMY CHAGNON,)
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)
)
Defendant.)

CASE NO. 2:17-CR-00089

MOTION TO POSTPONE SENTENCING

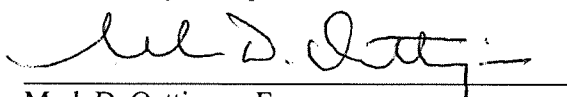
NOW COMES Defendant, Amy Chagnon, by and through her attorney, Mark D. Oettinger, and hereby respectfully requests that the Court postpone her sentencing for four and one-half months. In support of this Motion, Ms. Chagnon submits the following:

Ms. Chagnon is presently scheduled to be sentenced on her violation of conditions of supervised release on September 21, 2023. Since her re-incarceration, Ms. Chagnon has completed a drug recovery program, and will be submitting her Certificate of Completion in connection with her sentencing. Through the curriculum of that course, she has become aware of the existence and value of Moral Reconciliation Therapy (MRT), and she believes that undergoing MRT would greatly benefit her. The process takes four months, and if she can stay at Cheshire County Correctional Facility (where she is currently detained) for the necessary period of time, she is eligible to start MRT as soon as confirmation of the granting of this motion is received.

WHEREFORE, Ms. Chagnon respectfully requests that her sentencing be postponed by four and one-half months, so that she can come before the Court for sentencing with the benefit of the skills that she believes she will acquire through the MRT course.

Pursuant to Local Rule 7(a)(7), defense counsel has discussed this motion with AUSA Nicole Cate, who indicated that she needed to give the matter more thought, and possibly discuss the request with colleagues.

DATED at Burlington, Vermont this 15th day of September, 2023.



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